# THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NECA-IBEW HEALTH & WELFARE FUND, Individually And On Behalf Of All Others Similarly Situated,

Plaintiff,

VS.

Civil Action No. 1:08-cv-10783 (MGC)

GOLDMAN SACHS & CO., et al.,

Defendants.

#### NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law, Declaration of Walter Stampor, and accompanying exhibits, The Police and Fire Retirement System of the City of Detroit, by their undersigned counsel, will move this Court at the Courthouse, 500 Pearl Street, New York, New York 10007, on Thursday, May 20, 2010 at 9:30 a.m. for an Order granting its motion to intervene as of right, pursuant to Rule 24(a) of the Federal Rules of Civil Procedure ("Fed. R. Civ. P."), or, in the alternative, permissively, pursuant to Fed. R. Civ. P. 24(b), for the purpose of representing its interests and the interests of those who purchased the GSR Mortgage Loan Trust 2007-4F Mortgage-Backed Certificates and were damaged thereby. Movant attaches its proposed Complaint in Intervention as Exhibit A to the accompanying Memorandum of Law in Support of the Police and Fire Retirement System of the City of Detroit's Motion to Intervene (the "Memorandum of Law"). The grounds for this motion are more fully set forth in the Memorandum of Law.

DATED: April 26, 2010

New York, New York

Respectfully submitted,

### WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP

#### /s/ Lawrence P. Kolker

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